

RYDER LAW FIRM
6739 MYERS ROAD
EAST SYRACUSE, NEW YORK 13057
ryderlawfirm@gmail.com
Phone: 315-382-3617
Fax: 315-295-2502

December 3, 2020

Honorable Andrew T. Baxter
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

RE: RE: 5:20-cv-00489-GTS-ATB Compagni v. Town of Cortlandville, et al.
Mandatory Mediation deadline 12/3/20

Dear Judge Baxter:

Attorney Duggan and I have been in regular contact and have also agreed to use Mr. Pease as our mediator, but due to the extensive nature of the outstanding discovery in this case we are unable to move forward with our mediation on this date. We have presented Mr. Duggan with a Protective Stipulation in regards to the financial and business records of the Plaintiffs and are working with Mr. Duggan to find common ground on where we can streamline his demands. At this time, we estimate between seven and ten thousand pages of documents based on the original demands, much of which concerns confidential information.

With Mr. Duggan's consent, we are filing this letter motion requesting an extension on our mediation deadline. We would ask for a minimum of 90 days to continue our efforts in tackling our initial discovery prior to considering mediation. Mr. Duggan and I are of the opinion that mediation in this case may be productive and going into it prepared will be critical. Thank you.

Respectfully,



Jesse P. Ryder

CC: William Pease